

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA,	:	Civil No. 1:21CV00656
Plaintiff,	:	
	:	
v.	:	
	:	
2016 CHEVROLET CAMARO SS	:	
CONVERTIBLE,	:	
VIN 1G1FH3D79G0183851,	:	
Defendant.	:	

**VERIFIED COMPLAINT OF FORFEITURE**

NOW COMES the Plaintiff, United States of America, by and through Sandra J. Hairston, Acting United States Attorney for the Middle District of North Carolina, and respectfully states as follows:

1. This is a civil action *in rem* brought to enforce the provisions of 21 U.S.C. § 881(a)(4) and (6) for the forfeiture of the defendant property, which was used or intended to use to transport, or in any manner to facilitate the transportation, sale, receipt, possession, or concealment of a controlled substance or other property described in 21 U.S.C. § 881(a)(1), (2), or (9), or which constitutes proceeds traceable to the exchange of a controlled substance or listed chemical in violation of the Controlled Substances Act, 21 U.S.C. §§ 801 et seq.

2. The defendant property is a blue 2016 Chevrolet Camaro SS Convertible vehicle, VIN 1G1FH3D79G0183851, which was seized on March 8, 2021, from Argenis

Samuel RIVERA Alicea, in Lexington, North Carolina, and is currently in the custody of the United States Marshals Service.

3. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. Venue is proper in this district pursuant to 28 U.S.C. §§ 1355(b)(1) and 1395, because the defendant property was seized while located in the jurisdiction of this Court, or one or more of the acts giving rise to forfeiture occurred in this district.

5. Upon the filing of this complaint, the Plaintiff requests that the Court issue an arrest warrant *in rem* pursuant to Supplemental Rule G(3)(b), which the plaintiff will execute upon the property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

6. The facts and circumstances supporting the seizure and forfeiture of the defendant property are contained in Exhibit A, attached hereto and wholly incorporated herein by reference.

WHEREFORE, the United States of America prays that process of a Warrant for Arrest and Notice *In Rem* be issued for the arrest of the defendant property; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that judgment be entered declaring the defendant property be forfeited to the United States of America for disposition according to law; and that the United States of America be granted such other relief as this Court may deem just and proper, together with the costs and disbursements of this action.

This the 23rd day of August, 2021.


Respectfully submitted,

SANDRA J. HAIRSTON  
Acting United States Attorney

/s/ Nathan L. Strup  
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## VERIFICATION

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury under the laws of the United States of America, that the contents of the foregoing Complaint are true and correct to the best of my knowledge, information, and belief



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Chaz Norman  
Task Force Officer  
Drug Enforcement Administration